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Attorneys for Ms. Yvonne Martinez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE M. JAMES LORENZ)

UNITED STATES OF AMERICA,) CASE NO. 07cr3354-L
v.)
Plaintiff,) DATE: January 14, 2007
v.) TIME: 2:00 p.m.
YVONNE ANN MARTINEZ,) NOTICE OF MOTIONS:
Defendant.) (1) TO COMPEL DISCOVERY;
) (2) TO DISMISS THE INDICTMENT
) DUE TO MISINSTRUCTION OF
) THE GRAND JURY; AND,
) (3) FOR LEAVE TO FILE FURTHER
) MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
CHRISTINA McCALL, ASSISTANT UNITED STATES ATTORNEY:

20 PLEASE TAKE NOTICE that on January 14, 2007, at 2:00 p.m., or as soon thereafter
21 as counsel may be heard, the defendant, Yvonne Martinez, by and through her counsel,
22 Robert Rexrode, will ask this Court to enter an order granting the following motions.

MOTIONS

24 The defendant, Yvonne Martinez, by and through her attorney, Robert Rexrode,
25 pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all
26 other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) to compel discovery;
 - 3) to dismiss the indictment due to misinstruction of the grand jury; and,
 - 3) for leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motion.

Respectfully submitted,

Dated: December 25, 2007

/s/ Robert H. Rexrode
ROBERT H. REXRODE, III
Attorneys for Ms. Martinez
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